

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION, et  
al.,

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,  
SYNGENTA CORPORATION,  
SYNGENTA CROP PROTECTION, LLC

and

CORTEVA, INC.,

Defendants.

CASE NO. 1:22-CV-828-TDS-JEP

**DEFENDANT CORTEVA, INC.'S MOTION TO DISMISS  
COMPLAINT PURSUANT TO FED. R. CIV. P 12(b)(6)**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Corteva, Inc. ("Corteva"), by counsel, moves to dismiss Plaintiffs' complaint with prejudice for failure to state a claim. The grounds for Corteva's motion to dismiss are set forth in the contemporaneously filed memorandum of law in support of this motion.

WHEREFORE, Corteva respectfully requests that the court grant its motion and dismiss Plaintiffs' complaint and grant such other and further relief that the court deems appropriate.

Respectfully submitted on this 12th day of December 2022.

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83.1(d)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of December, 2022, I caused the foregoing MOTION TO DISMISS COMPLAINT PURSUANT TO FED. R. CIV. P 12(b)(6), and all attachments thereto, to be filed electronically with the Clerk of Court via the Court's CM/ECF system. Counsel for all parties in this case are registered CM/ECF users and will be served by the CM/ECF System:

MCGUIREWOODS LLP

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